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November 24, 2021

Via ECF

Honorable Marcia M. Henry, U.S.M.J.  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *A.W. v. New York City Department of Education, et al.*  
EDNY Case No. 19-CV-7011 (MKB)(MMH)

Dear Judge Henry:

My office, together with co-counsel, represents the plaintiff, A.W., in the above-referenced case.

I am writing on behalf of all parties to request that Your Honor extend the cutoff for fact discovery from December 2, 2021 to December 17, 2021. The parties are making this request because we have been having trouble scheduling depositions. This has been caused by scheduling conflicts, by the Thanksgiving Holiday, and by the fact that one of the defense witnesses had to have emergency eye surgery. The parties have now, however, set aside December 1, 2021 for the deposition of Plaintiff's father, E.W., and we have also set aside December 9, 16, and 17 for the deposition of Defendants' witnesses, and the witnesses have agreed to appear on those dates.

This is the parties' sixth, and we expect final, extension-request. The previous requests were granted. As set forth in our status-report letter dated November 10, 2021 (Document No. 51), the parties had expected to complete discovery by December 2, 2021. The parties apologize for the delay, but it should not affect any other deadlines.

Respectfully,

/s/ Brian L. Bromberg

Brian L. Bromberg

cc: All Counsel of Record (Via ECF)